

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO,

as representative of

THE COMMONWEALTH OF PUERTO
RICO, et.al.,

Debtors,

FRANCISCO M. RAMIREZ-RIVERA AND
LILIA M. RODRIGUEZ-COLON,

Claimants.

PROMESA
TITLE III

No. 17 BK 3283-LTS

(Jointly Administered)

Claim Numbers: 15006 and 15022

**RESPONSE TO PUERTO RICO SALES TAX FINANCING CORPORATION'S SIXTH
OMNIBUS OBJECTION (NON-SUBSTANTIVE) TO DEFICIENT CLAIMS**

To the Honorable Court:

NOW COMES claimants Francisco M. Ramirez-Rivera and Lilia M. Rodriguez-Colón and most respectfully state, allege and prays as follows:

1. On December 2018, the appearing parties were notified with copy of *Puerto Rico Sales Tax Financing Corporation's Sixth Omnibus Objection* ("Sixth Omnibus Objection") filed by the Puerto Rico Sales Tax Financing Corporation ("COFINA") before the United States District Court for the District of Puerto Rico (the "Court").
2. That pursuant to Exhibit A of the Sixth Omnibus Objection, it is alleged that with respect to claim numbers **15006** and **15022** the undersigned failed to provide the basis and/or supporting documents for asserting a valid claim against COFINA. (Exhibit A, page 24 of 83, items numbers 141 and 142). Claim numbers 15006 and 15022 appears to duplicate claimants account.
3. In response to the Sixth Omnibus Objection, and as evidence that the appearing parties have a valid claim against COFINA, attached hereto are copies of the following documents:

- A) Stamped copy of the Proof of Claim (Modified Official Form 410) filed by the appearing parties with the Court on May 14, 2018 at 3:56 pm. (**Exhibit I**)
 - B) UBS Financial Services of Puerto Rico (UBS) recent statement for the securities being held on account number JX 07326 B7, owned by the appearing parties. The attached statement corresponds to the December 1 @ December 31, 2018 period and shows that claimants are the owner of account number JX 07326 B7 and securities cover therein which includes COFINA bonds CUSIP 74529JNL5 and CUSIP 74529JGP4. (**Exhibit 2**, page 6 of 8)
 - C) UBS Junior Bond Distribution Election Notice for COFINA bond holders addressed to Claimants regarding claims against COFINA, identified as CUSIP#: 74529JNL5 and CUSIP#: 74529JGP4. (**Exhibits 3(a) and 3(b)**)
 - D) Proxy Vote Confirmation notice for CUSIP # 74529JGP4 and CUSIP # 74529JNL5. (**Exhibits 4(a) and 4(b)**)
4. That the documents listed in paragraph 3 above and the corresponding evidence attached hereto, establishes the validity of the claims of the appearing claimants against COFINA.

WHEREFORE the undersign parties respectfully request from this Honorable Court to rule that claimants have comply with the applicable rules, have provided the documentary evidence and basis to ascertain a claim against COFINA, that claims numbers 15006 and 15022 are valid claims against COFINA and it is further requested from this Honorable Court to deny the Sixth Omnibus Objection with respect to claim numbers 15006 and 15022.

RESPECTFULLY SUBMITTED.

IT IS HEREBY CERTIFIED that the foregoing document has been electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all attorneys of record.

In San Juan, Puerto Rico, this 25th. day of January, 2019

/s Francisco M. Ramirez-Rivera
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